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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA – WESTERN DIVISION

LA ALLIANCE FOR HUMAN
RIGHTS, et al. Plaintiff(s)

Plaintiff(s),

vs.

CITY OF LOS ANGELES, et. al.

Defendant(s).

CASE NO. 20-CV-02291-DOC-KES
Hon. David O. Carter
Courtroom 1

**PROPOSED INTERVENORS'
REQUEST FOR JUDICIAL NOTICE**

Date: None
Time: None
Ctrm: 1

Complaint Filed: March 10, 2020

1 **TO THE COURT, PLAINTIFFS, DEFENDANTS AND THEIR**
2 **ATTORNEYS OF RECORD:**

3 Pursuant to Rule 201 of the Federal Rules of Evidence, Proposed
4 Intervenors respectfully request that the Court take judicial notice of the
5 following court documents:

6 1. Complaint: Civil Rights, *Los Angeles Catholic Worker et al. v. Los*
7 *Angeles Downtown Industrial District Business Improvement District et al.*, 2:14-
8 cv-07344, Docket No. 1, filed September 19, 2014. A true and correct copy of the
9 complaint is attached as **Exhibit A**.

10 2. Stipulated Order of Dismissal, *Mitchell et al. v. City of Los Angeles*
11 *et al.*, CV16-01750 SJO (JPRx), Docket No. 119, filed May 31, 2019. A true and
12 correct copy of the Stipulated Order of Dismissal is attached as **Exhibit B**.

13 3. Order Denying Motion to Intervene for Lack of Jurisdiction,
14 *Mitchell et al. v. City of Los Angeles et al.* CV16-01750 SJO (JPRx), Docket No.
15 127, filed August 27, 2019. A true and correct copy of the order is attached as
16 **Exhibit C**.

17 4. The fact that the City of Los Angeles filed Brief of Amicus Curiae of
18 City of Los Angeles on Petition for Writ of Certiorari to the United States Court
19 of Appeal for the Ninth Circuit on *City of Boise v. Martin*, Case No. 19-247, filed
20 on September 25, 2019. A true and correct copy of the docket of the United
21 States Supreme Court is attached as **Exhibit D**.

22 5. The County of Los Angeles joined the Brief of Amicus Curiae of
23 California State Association of Counties and 33 California Counties and Cities on
24 Petition for Writ of Certiorari to the United States Court of Appeal for the Ninth
25 Circuit on *City of Boise v. Martin*, Case No. 19-247, filed on September 25, 2019.
26 A true and correct copy of the docket of the United States Supreme Court is
27 attached as **Exhibit D**.

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1 6. Central City East Association joined the Brief of Amicus Curiae
2 International Downtown Association, California Downtown Association, Central
3 City East Association Of Los Angeles, Hollywood Property, Owners' Alliance,
4 Historic Business Improvement District, Property Owners Association, and
5 Downtown Property Owner Association in Support of Petitioner for Writ of
6 Certiorari to the United States Court of Appeal for the Ninth Circuit on *City of*
7 *Boise v. Martin*, Case No. 19-247, filed on September 25, 2019. A true and
8 correct copy of the docket of the United States Supreme Court is attached as
9 **Exhibit D.**

10 Federal Rule of Evidence ("Fed. R. Evid.") 201 permits a Court to take
11 judicial notice of a "fact that is not subject to reasonable dispute because it (1) is
12 generally known within the trial court's territorial jurisdiction; or (2) can be
13 accurately and readily determined from sources whose accuracy cannot be
14 reasonably be questioned." Fed. R. Evid. 201(b).

15 A court "may take judicial notice of undisputed matters of public record,
16 including documents on file in federal or state courts." *Harris v. Cty. of Orange*,
17 682 F.3d 1126, 1132 (9th Cir. 2012) (internal citations omitted)

18 Proposed Intervenors request this Court take judicial notice of the
19 following documents, which are all on file in federal court.

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21 Dated: March 18, 2020 Respectfully submitted,

22 LAW OFFICE OF CAROL SOBEL
23 LEGAL AID FOUNDATION OF LOS ANGELES
24 SCHONBRUN SEPLOW
25 HARRIS & HOFFMAN LLP

26
27 _____
28 /s/ Catherine Sweetser
By: Catherine Sweetser
Attorneys for Plaintiffs for Intervenors